

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	Subchapter V
)	
PHILADELPHIA ORTHODONTICS, P.C.,)	Case No. 24-11728-PMM
)	
<i>Debtor.</i>)	
PHILADELPHIA ORTHODONTICS, P.C.,)	Docket No.
)	
<i>Movant,</i>)	Related to Dkt. Nos. 8 and 48
)	
v.)	
)	
BANK OF AMERICA; PARKVIEW ADVANCE; RAPID FINANCE; FORWARD FINANCING, LLC; and Biz2Credit a/k/a ITRIA VENTURES, LLC,)	
)	
Respondents.)	
)	

**CERTIFICATION OF NO OBJECTION AND CERTIFICATION OF
COUNSEL REGARDING INTERIM AND FINAL ORDERS AUTHORIZING
THE DEBTOR TO USE CASH COLLATERAL AND GRANTING RELATED RELIEF**

On May 23, 2024, this Court entered the *Interim Order (I) Authorizing the Debtor’s Use of Cash Collateral; (II) Granting Adequate Protection; (III) Scheduling a Final Hearing on the Use of Cash Collateral; and (IV) Granting Related Relief* [Dkt. 48] (the “Interim Cash Collateral Order”). The Interim Cash Collateral Order was entered in connection with the *Emergency Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor’s Use of Cash Collateral (II) Granting Adequate Protection; (III) Scheduling a Final Hearing on the Use of Cash Collateral; and (IV) Granting Related Relief* [Dkt. 8] filed by the Debtor on May 21, 2024 (the “Cash Collateral Motion”).

The undersigned certifies that he reviewed the docket in this matter and the only answer, objection, or other responsive pleading filed on the docket to the Interim Cash Collateral Order is the *Reservation of Rights and Conditional Objection of Bank of America, N.A. to the Debtor’s Motion to Use Cash Collateral* [Dkt. 87] (the “Reservation of Rights”) filed by Bank of America, N.A. (“Bank of America”).

Prior to the filing of the Reservation of Rights, the Debtor and Bank of America conferred on and agreed to language in the Final Cash Collateral Order, as more fully set forth below. The undersigned certifies that no other formal or informal answers, objections, or other responses were received to the Interim Cash Collateral Order.

The undersigned further certifies that:

- A proposed Final Cash Collateral Order is attached to this Certification of Counsel as Exhibit A. A redline version showing the changes made to the Interim Cash Collateral Order is attached to this Certification of Counsel as Exhibit B. Deletions are signified by a red line in the middle of the original text (strikeout) and additions are signified by blue text that is underlined. It is respectfully requested that the attached Final Cash Collateral Order be entered by the Court.
- Bank of America consents to the entry of the Final Cash Collateral Order in the form attached hereto as Exhibit A.
- Other than a scheduling order related to the Cash Collateral Motion [Dkt. 18] and the Interim Cash Collateral Order, no other order has been entered pertaining to the Cash Collateral Motion.
- The attached proposed Final Cash Collateral Order is a proposed order the Debtor respectfully requests this Court enter.

Respectfully submitted,

CAMPBELL & LEVINE, LLC

Dated: July 8, 2024

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